

### **REMARKS**

The Examiner is thanked for the performance of a thorough search.

Claims 1, 16, and 26-29 have been amended. No claims have been added or canceled.

Hence, Claims 1-39 are pending in the application.

The issues raised in the final Office Action mailed on July 17, 2006 are addressed hereinafter.

#### **I. ISSUES RELATING TO THE CITED ART**

##### **A. INDEPENDENT CLAIM 1**

Claim 1 was rejected under 35 U.S.C. § 102(a) as allegedly anticipated by Goertzel et al., U.S. Pat. No. 6,208,952 (“GOERTZEL”). The rejection is respectfully traversed.

1. GOERTZEL does not describe or suggest the feature of Claim 1 of sending a second packet to a second device on the second network, where the second packet includes a particular address of the intermediate device on the second network.

Claim 1 includes the feature of sending a second packet to a second device on the second network in response to receiving the first packet, the second packet including data indicating a particular address of the intermediate device on the second network. The Office Action asserts that GOERTZEL describes this feature in col. 4, lines 25-27 and col. 4, line 66 to col. 5, line 10. This assertion is incorrect.

The Office Action does not specify what exactly in GOERTZEL corresponds to, or constitutes, the intermediate device featured in Claim 1. As best understood by the Applicants, based on the citation to col. 4, lines 25-27 of GOERTZEL, the Office Action seems to assert that a communication process (such as communication process 260 in FIG. 2 of GOERTZEL) corresponds to the intermediate device of Claim 1. Further, based on the citation to col. 4, line

66 to col. 5, line 10, the Office Action seems to assert that a client process (such as client process 230 in FIG. 2 of GOERTZEL) corresponds to the first device of Claim 1, and that a server process (such as server process 270 in FIG. 2 of GOERTZEL) corresponds to the second device of Claim 1. Finally, the Office Action completely ignores the features of Claim 1 of a first network and a second network that is connected to the first network at the intermediate device. The Office Action does not specify and Applicants cannot find anything in GOERTZEL that corresponds to the first and second networks featured in Claim 1.

With respect to the feature of Claim 1 of sending a second packet to a second device on the second network where the second packet includes a particular address of the intermediate device on the second network, the Office Action seems to assert that the communication process in GOERTZEL sends to the server process a packet that includes a network address of the communication process. This is incorrect.

First, GOERTZEL does not describe or suggest a communication process that connects one network to another network or even a communication process that is identified on a network by its own network address. On the contrary, in col. 4, lines 38-40, GOERTZEL expressly states that a server computer system includes both a communication process and a server process. Further, in col. 4, lines 44-48, GOERTZEL expressly states that in order to send a message to the communication process, a client process must specify the network address of the server computer system and the well-known endpoint (e.g. port) of the communication process in order to be able to send a message to the communication process. Thus, the communication process in GOERTZEL not only does not connect one network to another network, but also is not even identified by separate network addresses in two separate networks. Hence, contrary to the assertion in the Office Action, the communication process in GOERTZEL cannot possibly send

to a server process a network address that identifies the communication process on a particular network.

Second, while in col. 5, lines 2-6 GOERTZEL may be describing that the communication process may send a notification to the sever process, there is nothing in this passage or in any other passage of GOERTZEL that describes or suggests that a communication process may send any network address to the server process. Since GOERTZEL expressly describes that a network address identifies the server computer system that includes both the communication process and the server process, there is absolutely no need to send this network address to the server process because the server process would already know it. Thus, GOERTZEL cannot possibly suggest that a communication process would send to the server process any network address.

For the above reasons, GOERTZEL does not describe or suggest the feature of Claim 1 of sending a second packet to a second device on the second network in response to receiving the first packet, the second packet including data indicating a particular address of the intermediate device on the second network.

2. GOERTZEL does not describe or suggest the feature of Claim 1 of determining whether the first packet includes a first message that registers a first resource on the first device with a protocol server for a particular protocol.

The Office Action asserts that GOERTZEL describes the above feature of Claim 1 in col. 4, lines 25-29 and 38-48, and in col. 6, lines 40-60. This assertion is incorrect.

As pointed out above, the Office Action asserts that the client process in GOERTZEL corresponds to the first device of Claim 1, and that the communication process of GOERTZEL corresponds to the intermediate device of Claim 1. Thus, the Office Action asserts that

GOERTZEL describes a communication process that can determine whether a packet received from a client process includes a message that registers a resource that is available on the client process. This assertion is incorrect.

GOERTZEL does not describe or suggest that a client process can provide any resources to any other entities. Further, in GOERTZEL the messages sent by the client process to the communication process include information identifying the server process from which the client process wants to request service and a list of protocols over which the client process is capable of communicating. (See GOERTZEL, col. 4, line 66 to col. 5, line 2.) Thus, not only the client process in GOERTZEL does not provide any resources, but also the messages sent by the client process are intended to request some resource (e.g. service) from a server process. For this reason, GOERTZEL does not describe, and cannot possibly suggest, the feature of Claim 1 of determining whether the first packet includes a first message that registers a first resource on the first device with a protocol server for a particular protocol.

The passages from GOERTZEL cited in the Office Action for this feature of Claim 1 do not describe what the Office Action asserts. For example, in col. 4, lines 25-29 and 38-48, GOERTZEL describes that when a communication process receives a request from a client process (where the request may be sent to a well-known endpoint of the communication process and may identify the network address of the server computer system, a protocol, and the well-known endpoint), the communication process notifies the server process to register the protocol specified in the request. The server process then registers the protocol and returns the assigned server process endpoint to the communication process. In col. 6, lines 40-60, GOERTZEL describes similar interactions between a client process, a communication process, and a server process, except that the client process is characterized as a client RPC sub-system, the communication process is characterized as a server RPC sub-system, and the server process

provides a call-back method for communicating with the communication process and a registration method for registering a protocol endpoint. Thus, nothing in these passages of GOERTZEL describes or suggests that the client process provides a resource or that the request sent by the client process identifies any resource provided by the client process.

For the above reasons, GOERTZEL does not describe or suggest the feature of Claim 1 of determining whether the first packet includes a first message that registers a first resource on the first device with a protocol server for a particular protocol.

3. GOERTZEL does not describe or suggest the feature of Claim 1 of wherein the steps of determining the first information in the first message and storing data indicating the first information in the first data structure are performed by the intermediate device.

As pointed out above, the Office Action asserts that the client process in GOERTZEL corresponds to the first device of Claim 1, and that the communication process of GOERTZEL corresponds to the intermediate device of Claim 1. However, the communication process of GOERTZEL does not perform registrations and does not register anything. In numerous passages GOERTZEL expressly states that it is the server process that registers an endpoint for a protocol over which a client process wants to communicate with the server process. (See at least col. 5, lines 6-10, and col. 6, lines 52-57.) Further, there is nothing in GOERTZEL that describes or suggests that a communication process is operable to register a resource provided by a client process.

In contrast, Claim 1 includes the feature of an intermediate device that performs the steps of: determining first information in a first message for uniquely requesting a first resource, where the first message is received at the intermediate device in a first packet sent from a first device;

and storing data indicating the first information in a first data structure in association with a first address, where the first address is an address of the first device in a first network.

For the foregoing reasons, GOERTZEL does not teach or suggest all features of Claim 1. Thus, Claim 1 is patentable under 35 U.S.C. § 102(a) over GOERTZEL. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

**B. INDEPENDENT CLAIMS 16 AND 26-29**

Claims 16 and 26-29 were rejected under 35 U.S.C. § 102(a) as allegedly anticipated by GOERTZEL.

Claims 16 and 26-29 include features similar to the features of Claim 1 discussed above. Thus, Claims 16 and 26-29 are patentable under 35 U.S.C. § 102(a) over GOERTZEL for at least the reasons given above with respect to Claim 1. Reconsideration and withdrawal of the rejections of Claims 16 and 26-29 are respectfully requested.

**C. DEPENDENT CLAIMS 2-15, 17-25, AND 30-39**

Claims 2-10, 13-14, 17-25, 30-32 and 35-37 were rejected under 35 U.S.C. § 102(a) as allegedly anticipated by GOERTZEL. Claims 11-12, 33, and 38 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over GOERTZEL in view of Blum et al., U.S. Pat. No. 6,182,141 ("BLUM"). Claims 15, 34, and 39 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over GOERTZEL in view of Graham et al., U.S. Pat. No. 6,594,700 ("GRAHAM").

Each of Claims 2-15, 17-25, and 30-39 depends from one of independent Claims 1, 16, 28, and 29, and thus includes each and every feature of the independent base claim. Furthermore, in rejecting Claims 11-12, 15, 33-34, and 39 the Office Action relies explicitly on GOERTZEL, and not on BLUM or GRAHAM, to show the features discussed above with respect to Claims 1, 16, and 28-29. Because GOERTZEL does not teach the subject matter of

Claims 1, 16, and 28-29, any combination of GOERTZEL with BLUM and/or GRAHAM necessarily fails to teach the complete combination recited in any claim that depends from Claims 1, 16, 28, or 29. Thus, each of Claims 2-15, 17-25, and 30-39 is allowable for at least the reasons given above for Claims 1, 16, 28, and 29.

In addition, each of Claims 2-15, 17-25, and 30-39 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 2-15, 17-25, and 30-39 are allowable for the reasons given above with respect to Claims 1, 16, 28, and 29.

## II. CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicants respectfully submit that allowance of all pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.

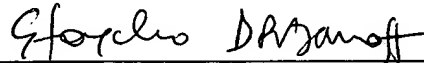
The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

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Stoycho D. Draganoff

Reg. No. 56,181

2055 Gateway Place, Suite 550  
San Jose, California 95110-1089  
Telephone No.: (408) 414-1080 ext. 208  
Facsimile No.: (408) 414-1076